



760 SW Ninth Ave., Suite 3000  
Portland, OR 97205  
T. 503.224.3380  
F. 503.220.2480  
www.stoel.com

THOMAS R. WOOD  
D. 503.294.9396  
tom.wood@stoel.com

August 3, 2017

**BY EMAIL AND U.S. MAIL**

Julie Vergeront ([Vergeront.Julie@epa.gov](mailto:Vergeront.Julie@epa.gov))  
Assistant Regional Counsel  
EPA Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Re: Longview Fibre Paper and Packaging, Inc., dba KapStone Kraft Paper Corporation**

Dear Julie:

Longview Fibre Paper and Packaging, Inc. dba KapStone Kraft Paper Corporation ("KapStone") received your letter dated July 13, 2017 requesting that the company provide information pursuant to Section 114 of the Clean Air Act (the "Request") concerning the No. 4 Messing & Durkee ("M&D") digester located at the Longview, WA mill. Consistent with our discussions last week, we are submitting this letter to request an extension of the schedule for collecting the requested process data. We are also providing you with information regarding the requested process data that KapStone will and will not be able to provide you.

**Testing Schedule**

The Request asks for KapStone to conduct methanol and total reduced sulfur ("TRS") testing at specified locations no later than 90 days after receipt of the Request and to report those results to the agency no later than 45 days after completing the tests. KapStone requests that the deadline for completion of the performance testing be extended until November 30, 2017 and that the deadline for submitting the test reports be correspondingly extended to January 15, 2018. The reasons for this extension are as follows:

- KapStone requires time to bid and coordinate testing with stack testing firms. This is not simple testing and scheduling is time sensitive. It is critical to evaluate multiple firms to make sure they have the expertise and availability to perform this work in a timely fashion.

- KapStone requires time to determine how long it will take to meet the sample volume collection requirements. This will impact the duration and cost of the testing so stack testing firms would need to know this in advance of submitting proposals.
- Once a stack testing firm is hired, we need time to prepare and review the stack testing protocol to make sure it addresses the detailed requirements listed in EPA's request.
- KapStone requires time to coordinate with other upcoming stack testing already scheduled and a mill outage when a number of units will be down (likely including the M&D Digester).
- KapStone requires time to install testing port(s) in the lines.
- KapStone requires time to address any potential questions from EPA regarding the stack testing protocol.
- As all things always take longer than anticipated, KapStone is also building in a small amount of buffer time in case things don't work as planned.

For all of these reasons, KapStone is requesting a reasonable amount of additional time to complete the performance testing.

### **Process Data Availability**

Attachment A of the Request requires that KapStone collect and report "process data" covering the time period starting 30 days prior to the performance testing and ending five days after testing concludes. The definition of "process data" identifies the data points expected to be collected. The table below identifies each requested data point and identifies whether KapStone has the reasonable capability of collecting the requested information.

<b>Parameter</b>	<b>KapStone Able to Provide?</b>	<b>Notes</b>
Sawdust mass feed rate (bone dry tons/hr) and wood species (percent);	Yes	
Screw conveyor/metering screw rate in revolutions per minute (rpm)	No	KapStone does not monitor the screw conveyor turn rate and has no reasonable means to do so. Also, the screw conveyor turns at one speed.

Parameter	KapStone Able to Provide?	Notes
Millwater into the screw conveyor/metering screw volumetric flow rate and temperature	No	KapStone does not monitor the millwater temperature and flow rate at this location and has no reasonable means to do so. As we previously informed EPA, operators use millwater only to troubleshoot seating issues with the valve during maintenance. No water use will occur during testing.
Cooking liquor (or any other substance added to the sawdust prior to the digester) volumetric or mass feed rate, as appropriate	No	As we previously informed EPA, no liquor or other substance is added to the sawdust prior to the digester.
M&D Digester Inlet Valve RPM	Yes	
M&D Digester Inlet Valve Primary Exhaust (recycled) steam temperature and pressure	No	KapStone does not have instrumentation installed to monitor these parameters on this line and such instrumentation cannot be reasonably added.
M&D Digester Inlet Valve Rotor pocket pre-purge steam temperature and pressure	Pressure—Yes* Temperature—No	KapStone does not have instrumentation installed to monitor temperature and such instrumentation cannot be reasonably added.
M&D Digester Inlet Valve Rotor pocket purge steam temperature and pressure	Pressure—Yes* Temperature—No	KapStone does not have instrumentation installed to monitor temperature and such instrumentation cannot be reasonably added.
M&D Digester Inlet Valve Secondary exhaust temperature and pressure	No	KapStone does not have instrumentation installed to monitor temperature or pressure on the secondary exhaust and such instrumentation cannot be reasonably added.
Digester production rate (tons of oven dried pulp (ODP)/hr);	Yes	

Julie Vergeront  
August 3, 2017  
Page 4

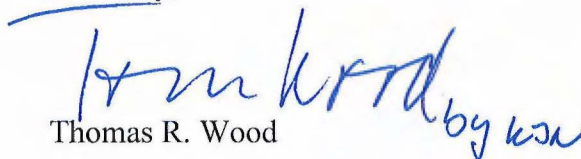
Parameter	KapStone Able to Provide?	Notes
Any other process parameter used by the Facility or testing firm in determining or calculating emission rates in all units of measure required by this Information Request	Yes	

\*There is a common steam line that splits to feed the inlet valve pocket pre-purge and purge steam. Pressure is measured in the line prior to the split. There is only one pressure measurement.

The process data identified above as available will be provided as part of the required reports.

Please let me know if you have any questions after considering this letter. KapStone shall proceed consistent with the requested schedule, but we would appreciate confirmation of EPA's concurrence with the revised deadlines.

Sincerely,

  
Thomas R. Wood

cc (by email):  
Roberto Artiga  
Paul Duncan  
Kay Shirey